

**REMARKS**

Claims 1, 5 and 14-18 are all the claims pending in the application. Claims 1, 5, 16, and 17 have been amended for clarity and form. Claims 2, 3, 4, and 6 has been cancelled without prejudice. Claim 18 has been added to give a further variety of claim scope. Applicant respectfully submits that these amendments and additions are fully supported by the specification as originally filed and in particular pages 10 and 11.

**I. Formalities**

Applicant thanks the Examiner for indicating the acceptance of the drawings filed August 16, 2007.

**II. Claim Rejections - 35 U.S.C. § 112**

Applicant respectfully requests the Examiner withdraw the rejection to claims 1, 5, 16, and 17 under 35 U.S.C. § 112, ¶ 2 in view of the self-explanatory amendments presented above.

**III. Claim Rejections - 35 U.S.C. § 103**

Claims 1, 5 and 14-17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Nguyen et al. (US 6,377,254, filed 9/21/1998, and further in view of W3School (“HTML Tutorial: Welcome to HTML School”, published as of 1/23/2002). Applicant respectfully traverses the rejection.

Claim 1 recites, *inter alia*,

judging whether a document written in a structured tag language comprises any of “position”-type tags, “margin”-type tags and “line\_height”-type tags;

**performing control, when said tags are judged to be comprised, such that processing to form images is executed after completing processing to determine coordinate positions;**

Applicant respectfully submits that Nguyen fails to teach or suggest at least “**performing control, when said tags are judged to be comprised, such that processing to form images is executed after completing processing to determine coordinate positions.**”

In other words, the claim requires that if “**said tags are judged to be comprised**”, the control method **determines the positions of all objects in the entire document (or a page in the case of new claims 18 and 19), before initiating the processing to form images.** Nguyen **does not predetermine positions of all elements in a document or a page** prior to initiating image formation even if it is determined that an overlap exists in the document or the page. As such, Applicant respectfully submits that Nguyen fails to teach or suggest all the features and limitations of the claims. Further, it is clear that W3School fails to make up for the deficiencies of Nguyen.

Accordingly, Applicant respectfully submits that claims 1 would not have been obvious under 35 U.S.C. § 103(a) over Nguyen in view of W3School, because the references, alone or in combination, do not teach or suggest all of the features and limitations of the claims. Accordingly, Applicant respectfully requests the Examiner to withdraw the rejection of claim 1 and claim 4 at least by virtue of its dependency from claim 1.

Applicant further respectfully submits independent claims 5, 14, 15, and new independent claim 18 are patentable over the cited combination for the same or similar reasons. Accordingly, Applicant respectfully requests the Examiner to withdraw the rejection of claims 5, 14, 15, and

new independent claim 18 and claims 16 and 17 at least by virtue of their dependency from claims 14, and 15.

**IV. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

/Logan J. Brown 58,290/  
Logan J. Brown  
Registration No. 58,290

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: January 31, 2008